

# GRONEK & ARMSTRONG

ATTORNEYS AT LAW

98TH FLOOR - SEARS TOWER  
233 SOUTH WACKER DRIVE  
CHICAGO, ILLINOIS 60606

FDALAW@GRONEKANDARMSTRONG.COM

DENNIS M. GRONEK  
ROBERT E. ARMSTRONG  
PAUL J. WISNIEWSKI  
JACQUELINE P. KULER

TEL: (312) 655-1800  
FAX: (312) 655-1808



August 11, 2004

Office of Nutritional Products Labeling  
and Dietary Supplements (HFS-810)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Pkwy  
College Park, MD 20740

Re: Notification for Statements on Dietary Supplement Labels

Dear Sir/Madam:

This firm represents Synergy Worldwide, Orem, Utah, a distributor of dietary supplement products (hereafter "Synergy"). Synergy has requested that we notify your Agency on its behalf of the inclusion of statements of nutritional support on its dietary supplement product labels.

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. §343(r)(6), and in accordance with the authorized provisions of 21 CFR §101.93(a), your Agency is hereby notified that Synergy has made statements of "nutritional support", as described in 21 U.S.C. §343(r)(6)(A), for dietary supplements as follows:

**Name**

**Label Statement(s)**

Age Renew

Age-defying complex. Age Renew features the latest in age-defying hormone technology, including an exclusive blend of DHEA, Pregnenolone and other powerful human growth hormone releasers. These hormones are some of the most powerful compounds known today for supporting youthfulness and vitality.

97S 0162

LET

14513

CarboSmart

Carbohydrate complexer. CarboSmart naturally and safely helps support your body's ability to block carbohydrate digestion and reduce the available calories that may otherwise convert to fat. CarboSmart is 100% stimulant free.

CyberSport

Strength enhancer. CyberSport strength enhancer provides the nutrients athletes need in order to build strength while at the same time supplying essential elements necessary for lean muscle gain.

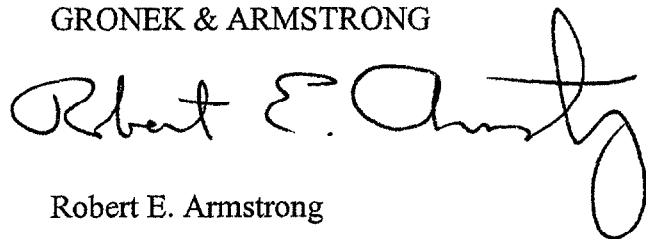
SyneMax

SyneMax is an organic fulvic acid complex containing a broad spectrum of essential trace minerals, vitamins, amino acids, and enzymes. It delivers these powerful compounds through a liquid fulvate suspension that aids in breaking down the minerals and nutrients, dramatically increasing their absorbability, and providing aggressive antioxidant protection. Formulated as a balanced nutritional complex, SyneMax contains many important nutrients critical to health and well being.

Two copies of this notification are enclosed with this original document.

The undersigned hereby certifies on behalf of Synergy that the information contained in this correspondence is complete and accurate.

Sincerely yours,  
GRONEK & ARMSTRONG

A handwritten signature in black ink, appearing to read "Robert E. Armstrong". The signature is fluid and cursive, with a large loop at the end of the last name.

Robert E. Armstrong

REA:  
pr

Enclosures

CC: Synergy Worldwide